# UNITED STATES DISTRICT COURT DISTRICT OF PUERTO RICO

AVRAHAM EISENBERG,

Plaintiff,

v.

Civil Action No. 3:22-cv-01325

NUMERIS LTD.; SASHA IVANOV; and DOES 1-10,

Defendants.

## PLAINTIFF'S MOTION FOR ISSUANCE OF SUBPOENA

Plaintiff Avraham Eisenberg respectfully requests that the Clerk issue the subpoena directed to NameCheap, Inc. pursuant to Federal Rule of Civil Procedure 45(a)(3) and in accordance with the Court's Order [ECF No. 9]. In support, Eisenberg respectfully shows the Court as follows:

The subpoena directed to NameCheap, Inc. is attached as Exhibit 1. This subpoena seeks limited information relevant for Plaintiff to identify the unnamed defendants referenced in the Complaint. Specifically, the identify of the individual(s) operating the vires.finance website based on the information provided to NameCheap to register this domain name. Because this subpoena requests information that is narrowly tailored to obtain the identities of the unnamed defendants, Plaintiff respectfully requests that the Court permit the clerk to issue this subpoena.

## **CONCLUSION**

For these reasons, Plaintiff Eisenberg respectfully requests that this Court grant this Motion by ordering that the Clerk issue the attached subpoena directed to NameCheap, Inc.

Dated: September 21, 2022 Respectfully,

JAMES H. CREEDON (Pro Hac Vice)

Texas Bar No. 24092299 jhcreedon@creedon.com

CHRISTIAN COWART (Pro Hac Vice)

Texas Bar No. 24105748 ccowart@creedon.com

### **CREEDON PLLC**

5 Cowboys Way, Suite 300

Frisco, Texas 75034 Tel: (972) 850-6864 Fax: (972) 920-3290

#### CORTLAND C. PUTBRESE

Puerto Rico Federal Bar No. 305708 cputbrese@dbllawys.com

## **DUNLAP BENNETT & LUDWIG PLLC**

8003 Franklin Farms Dr., Suite 220

Richmond, Virginia 23229

Tel: (804) 977-2688 Fax: (804) 977-2680

#### SAMUEL H. JOHNSON (Pro Hac Vice)

Texas Bar No. 24065507 sam@jfbusinesslaw.com

## JOHNSON FRIEDMAN LAW GROUP, PLLC

7161 Bishop Road, Suite 220

Plano, Texas 75024 Tel: (214) 382-0300 Fax: (214) 466-2481

COUNSEL FOR PLAINTIFF AVRAHAM EISENBERG

## **CERTIFICATE OF SERVICE**

I certify that, on September 21, 2022, the foregoing document has been filed with the Clerk via the Court's CM/ECF system and served on all counsel of record who are deemed to have consented to electronic service via the Court's NEF system or the registered users' email accounts per Rule 5(b) and LR 5(b).

CHRISTIAN COWART